

## **Attachment A**

Defendants respectfully direct the Court's attention to the following exhibits in support of Additional Undisputed Material Fact 21, excerpted below.

21. Based on this understanding, Heath and the Progrexion Company Defendants trained call center representatives marketing or selling Heath's service and Heath's paralegals on compliance with the TSR, CROA, and other applicable laws. Exhibit 17, eFolks Compliance Training, PGX.CFPB.00002635, 46-49, 54; Exhibit 12, CTRL\_LEX00000144, 47; Exhibit 18, Progrexion Compliance Training, PGX.CFPB.00001948, 53-58, 74-76; Exhibit 52, Compliance: New Hire Training, PGX.CFPB.00003788, 94; Exhibit 53, eFolks Compliance: New Hire Training, PGX0002568, 1-83; Exhibit 24, Etherington Dep. 90:20-25, 126:21-127:12; Exhibit 19, Regulatory Compliance, LEX0001561; Exhibit 30, LEX0001548, Regulatory Compliance v2; Exhibit 54, Lead Training: Compliance, LEX0001572; Exhibit 55, Lead Compliance Training Cheat Sheet, LEX0001573; Exhibit 56, Lead Training Issue Matrix, LEX0001877; Exhibit 57, PGX Compliance Final, PGX0000810; Exhibit 58, Credit Matters New Hire Training, PGX0004424, 33-38; Exhibit 59, Compliance: New Hire Training, Laws & Regulations, PGX0002148; Exhibit 60, Service Guarantees, LEX0001790; Exhibit 61, Compliance Module 1 – Overview, LEX0001924.

Defendants respectfully direct the Court's attention to the following exhibits in support of Additional Undisputed Material Fact 22, excerpted below.

22. Based on this understanding, the Progrexion Defendants trained call center representatives marketing or selling CreditRepair.com's services on compliance with the TSR, CROA, and other applicable laws. Exhibit 37, CR Compliance 101, PGX0000475; Exhibit 38, CR Compliance 102, PGX0002924; Exhibit 45, CR Compliance 103, PGX0004079; Exhibit 39, CR Compliance

104, PGX0000452; Exhibit 62, Compliance: New Hire Training Laws & Regulations,  
PGX0001860; Exhibit 63, CR Credit Matters, PGX0002160, 7-12.